

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

KRISTEN McDONALD, both individually
and on behalf of a class of others similarly
situated,

Plaintiff,

v.

FRANKLIN COUNTY, OHIO

Defendant,

Civil Action No.: 2:13-cv-503 (MHW/TPK)

**PLAINTIFF'S NOTICE OF MOTION FOR SUMMARY JUDGMENT AND
PERMANENT INJUNCTION**

PLEASE TAKE NOTICE THAT Plaintiff Kristen McDonald, upon the annexed affirmation of Elmer Robert Keach, III, with exhibits, and the Plaintiff's Memorandum of Law, hereby moves this Court, pursuant to Rule 56 of the Federal Rules of Civil Procedure, for Summary Judgment, and further seeks a Permanent Injunction. The time within which the Defendant is to respond has been established by scheduling order.

The Plaintiff requests that the Court entertain oral argument on this motion.

Respectfully Submitted By:

Dated: December 14, 2016

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